

1 Kevin P.B. Johnson (Bar No. 177129)
QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
2 555 Twin Dolphin Drive, Suite 560
Redwood Shores, California 94065-2139
3 Telephone: (650) 801-5000
Facsimile: (650) 801-5100

4 Steven M. Anderson (Bar No. 144014)
QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
5 865 S. Figueroa St. 10th Floor
6 Los Angeles, California 90017
Telephone: (213) 443-3000
7 Facsimile: (213) 443-3100

8 Attorneys for Plaintiff Sony Corporation

9
10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 SONY CORPORATION,

14 Plaintiff,

15 v.

16 VIZIO, INC.,

17 Defendant.
18
19
20
21
22
23
24
25
26
27
28

CASE NO. CV 08-01135-RGK (FMOx)

DISCOVERY MATTER

**DECLARATION OF PETER A. KLIVANS
IN SUPPORT OF SONY'S PORTION OF
JOINT STIPULATION REGARDING VIZIO
INC.'S MOTION TO COMPEL FURTHER
RESPONSES TO VIZIO'S
INTERROGATORY NOS. 2, 15, 16**

Magistrate Judge: Hon. Fernando M. Olguin

Discovery Cut-Off Date: November 1, 2009

Pretrial Conference Date: January 10, 2010

Trial Date: January 26, 2010

1 1. I am an attorney with the law firm of Quinn Emanuel Urquhart Oliver
2 & Hedges, LLP, counsel for Sony Corporation ("Sony"). I submit this declaration
3 in support of Sony's portion of the parties' JOINT STIPULATION REGARDING VIZIO
4 INC.'S MOTION TO COMPEL FURTHER RESPONSES TO VIZIO'S INTERROGATORY
5 NOS. 2, 15, 16. I have personal knowledge of the facts stated in this declaration, and
6 if called upon to do so, could and would competently testify thereto.

7 2. Attached hereto as Exhibit A is a true and correct copy of a July 8,
8 2009 letter from Ryan McCrum to Todd Kennedy.

9 3. I have personally overseen the search for documents relating to Sony's
10 pre-filing investigation; the production of such documents, when non-privileged, to
11 Vizio; and the production to Vizio of a privilege log for such documents, when
12 privileged.

13 4. Attached hereto as Exhibit B is a true and correct copy of documents
14 produced by Sony to Vizio with the production number range SONY0081687-689.

15 5. Attached hereto as Exhibit C is a true and correct copy of excerpted
16 pages (relating to claim 33 of the '847 patent) from Exhibit F to Sony's Third
17 Supplemental Response to Vizio's First Set of Interrogatories (No. 1).

18 6. Attached hereto as Exhibit D is a true and correct copy of the Exhibit
19 "Rog. 3 – '847 chart" attached to Vizio's First Supplemental Response to Sony's
20 Interrogatory Nos. 2, 3, 8, 10, 11, 14 and 18.

21 7. Attached hereto as Exhibit E is a true and correct copy of a July 6,
22 2009 letter from Peter Klivans to Ryan McCrum.

23 8. Attached hereto as Exhibit F is a true and correct copy of a July 7,
24 2009 letter from Ryan McCrum to Peter Klivans.

1 DATED: July 10, 2009

QUINN EMANUEL URQUHART OLIVER &
HEDGES. LLP

2
3
4 Bv _____/s/_____
Peter A. Klivans
Attorneys for Plaintiff SONY
CORPORATION
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS FOR EXHIBITS

<u>Exhibit</u>	<u>Page No.</u>
<u>Exhibit A:</u>	3
<u>Exhibit B:</u>	7
<u>Exhibit C:</u>	11
<u>Exhibit D:</u>	52
<u>Exhibit E:</u>	56
<u>Exhibit F:</u>	59